

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TIMOTHY A. NIX,)	
)	
Plaintiff,)	
)	No. 14 CV 03399
v.)	
)	
JEFFREY DELOZIER & SYGMA)	
NETWORK, INC.,)	
)	
Defendants/ Third Party Plaintiffs,)	
)	
v.)	
)	
TA OPERATION, LLC d/b/a TRAVEL)	
CENTERS OF AMERICA,)	
)	
Third Party Defendant.)	

JOINT CURRENT STATUS UPDATE

Pursuant to Order entered October 31, 2016, the parties submit the following Joint Current Status Update:

1. Case Plan and Discovery Issues:

- a. Discovery Completed and Needed:** This case involves a rear-end collision between two tractor trailers on I-294. Defendants claim the brakes failed and filed a Third Party Complaint against Travel Centers of America for negligent maintenance. On or about August 4, 2016, Plaintiff Timothy Nix retained new counsel in this matter, Ray Gupta of Ray Gupta & Associates, LLC, and counsel agreed to allow Plaintiff's counsel time to review the case file. Defendants will re-notice the deposition of the Travel Centers representative and exchange expert reports.

The parties have completed the depositions of thirteen liability fact witnesses. Defendants intend on taking six additional liability fact witness depositions, eight expert witnesses, four treating medical providers and four lay damage witnesses. There are no pending discovery issues.

- b. **Fact Discovery and Treating Medical Providers Completion Date: June 1, 2017**
 - c. **Parties to agree on disclosure sequence of experts**
 - d. **Expert Discovery Completion Date: August 1, 2017**
- 2. **Pending Motions:** None
 - 3. **Consent to Proceed Before a Magistrate:** No
 - 4. **Status of Settlement Discussions:** None at this time.

DATED: November 22, 2016.

Respectfully submitted,

RAY GUPTA & ASSOCIATES

By: /s/ Ray Gupta

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KOPKA, PINKUS & DOLIN, P.C.

By: /s/ Thomas S. Ehrhardt

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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2016, I electronically filed with the Clerk of the Court using the ECF system the **Joint Current Status Update** in the above matter, which will send notification of such filing upon all other parties who have appeared.

Dated this 22nd day of November, 2016.

Respectfully submitted,
JEFFREY L. DELOZIER and
SYGMA NETWORK, INC.

By: /s/ Eric D. Carlson
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